Application No.: 10/003773 Docket No.: TSQ-001

## REMARKS

Claims 1-34 are pending of which claims 1, 25, 27, 30 and 31 are independent.

Summary of Claimed Invention

The claimed invention claims a method for cross-referencing, searching and displaying entries in a document publishing system. The publishing system uses input data such as email messages, attachments to emails, web clippings, audio and video data files, and user input text, to create new documents, such as web pages viewable via a web browser. Unique identification numbers are automatically assigned to entries in the publishing system and naturally occurring segments of entries, such as headings and paragraphs separated by white space. User assigned labels may be attached to user selected segments of each entry. The identification numbers and labels are cross-linked by a series of algorithms. Changes in content of an entry are saved as updates with the latest version cross-linked to previous versions. The labels applied to the previous version of the entry are automatically applied to the corresponding segments of the updated entry, even if the labeled segments are updated or rearranged by the update action. The cross-linking of entries enables users to search by time (content), by topic (label), or both. Different versions of content in an entry may be displayed to a user such that the evolution of an entry over time is revealed. Searching may also be conducted using labels or topics as keywords such that either user-attached labels or automatically generated labels from the cross-linking algorithms are used to generate documents for users which display references to entries and/or items containing the particular label or topic. Documents generated by the illustrative embodiment include links to other entries and/or items which are associated with the content being displayed to the user. The user assigned labels also enable a search mechanism to quickly assemble user-defined relevant portions of each entry while omitting extraneous matters contained in the entries.

Summary of Claim Amendments

Applicants have amended the independent claims to remove the claim limitation the Examiner cited as responsible for generating the 35 U.S.C. §112 rejections. Applicants have

also amended claim 25 to indicate that the new entry indicates the time the new entry was updated and claim 31 to indicate that each of the entries indicates the time the label became affixed to the entry. Applicants have also amended claim 1 to clarify that the claim is in the alternative in light of the recent " Superguide v. DirectTV" decision by the United States Court of Appeals for the Federal Circuit. The amendment to claim 1 is consistent with Applicants' position throughout prosecution and should not require a new prior art search.

Claim Rejections Pursuant to 35 U.S.C. §112

Applicants have removed the claim limitation the Examiner cited as the basis for the 35 U.S.C. §112 rejections from the independent claims.

Claim Rejections Pursuant to 35 U.S.C. §102(e)

Claims 1-7, 14-15 and 17-31 were rejected under 35 U.S.C. §102(e) as being anticipated by deVries et al (United States Patent Number 6, 311, 189, hereafter "deVries"). For the reasons set forth below, Applicants respectfully traverse the rejections.

Summary of deVries

The Examiner-cited reference deVries discusses a method of matching a query to a portion of media. The query is used to search an index of annotations related to a first digitized representation corresponding to raw analog data. Queries are matched to annotation values in an annotation index. The result of the matching process enables a start time for the portion of media of interest in a media stream to be identified.

Argument

The cited reference deVries fails to disclose all of the elements of Applicants independent claims as amended. Accordingly, deVries fails to anticipate any of the pending claims in Applicants invention.

Claim 1, upon which claims 2-24 and 32-34 are dependent, includes the limitation of "updating a metastructure associated with the selected entry to reflect relationship changes caused by the new entry, said updating including the time said selected entry was altered (emphasis added)." The cited reference deVries fails to disclose this limitation. The Examiner cited col. 17, lines 17-38, col. 19, lines 17-45 and column 19, lines 59-67 and col. 20, lines 1-50 as revealing the elements of the above limitation. A close examination of the sections (please see below) fails to reveal the disclosure of the limitation requiring the updating of the metastructure to include the time the selected entry was altered.

Column 17, lines 17-38 in deVries discusses the addition of an entry in the index database for each annotation value. The annotation value entries include a list of start times for each occurrence of the annotation value within the associated object (see col. 17, lines 19-22). The "associated object" referred to is a first digital representation of raw audio/video data (see col. 8, lines 3-8 and throughout). The deVries reference is discussing the digitization of an analog media stream to make the manipulation and searching of the analog data stream easier. The start time referred to in the cited section of column 17 is to a start time in the digitized data stream, not the time of updating of an entry as required by Applicants claims. One of the aspects of Applicants invention is the identification of an entry's evolution over time, functionality that is enabled by the addition to the metastructure associated with the entry of the time occurrence of the different alterations made to the entry. For example, Applicants invention allows a user to determine when a label or labels were added or removed to a document. See Figure 4E in the Applicants application and the discussion thereon for an illustration and additional explanation. In contrast, deVries is trying to indicate where in a data stream an event occurred. For example, deVries would enable a user to identify that Mr. Smith spoke at the 10 second mark of a particular audio stream. The two concepts are wholly different. Similarly, col. 19, lines 17-45 in deVries is discussing the locking mechanism employed in deVries to allow multiple annotation clients to add annotations to the digitized stream without resulting in multiple versions of annotations associated with the digitized stream. In brief, each annotation client has a time window in which to complete annotation work and return it to a librarian for saving before another annotation client can begin work. If the annotation data is not returned during the

time window, the annotation librarian does not update the records. This mechanism allows for a distributed processing architecture to be employed. The section does not discuss adding the time of the update to the metastructure associated with the entry but rather is discussing checking when the annotation data is returned by the annotation client to the librarian to determine if the work was performed during the annotation client's assigned time. Col. 19, lines 59-67 and col 20, lines 1-50 in deVries also do not discuss updating the metastructure associated with the entry with the time the selected entry was altered but rather are discussing the use of the annotations affixed to the digitized stream to answer user queries.

Accordingly, Applicants respectfully suggest that claims 1-24 and 32-34 are in condition for allowance since deVries fails to disclose all of the elements of Applicants independent claims. Since independent claims 25, upon which claim 26 is dependent, independent claim 27, upon which claims 28-29 are dependent, and independent claims 30 and 31 also require the updating process to indicate the time of the updating ( "the new entry indicating the time of the updating [claim 25]", "updating a metastructure associated with said selected entry to indicate the time said selected entry was altered[claim 27]", "storing in a data structure associated with said selected entry the time said labels became associated with said selected entry[claim 30]", "each of the entries indicating the time the label became affixed to the entry[claim 31]"), Applicants respectfully suggest the remaining claims are also in condition for allowance.

Indication of Allowable Subject Matter

Claims 8-13 and 16 were objected to by the Examiner as being dependent upon a rejected base claim but were indicated to be allowable if re-written in independent form including all of the limitations of the base claim and any intervening claims. Applicants appreciate the indication of the allowability of the claims from the Examiner. However, Applicants respectfully decline to rewrite the claims at this time as Applicants believe all of the claims are presently allowable in view of the current amendments and the arguments submitted above.

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## CONCLUSION

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. TSQ-001 from which the undersigned is authorized to draw.

Dated: May 23, 2005

Respectfully submitted,

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